

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

TAREK BAZROUK,

Defendant.

**SUPERSEDING INFORMATION**

S1 25 Cr. 203 (RMB)

**COUNT ONE**  
**(Conspiracy to Commit Hate Crimes)**

The United States Attorney charges:

1. From at least in or about April 2024, up to and including at least in or about January 2025, in the Southern District of New York and elsewhere, TAREK BAZROUK, the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, hate crime acts, in violation of Title 18, United States Code, Section 249(a)(1)(A).

2. It was a part and object of the conspiracy that TAREK BAZROUK, the defendant, and others known and unknown, would and did willfully cause bodily injury to multiple victims, because of the victims' actual and perceived race, the victims' actual and perceived religion, and the victims' actual and perceived national origin.

**Overt Acts**

3. In furtherance of the conspiracy, and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about April 15, 2024, TAREK BAZROUK, the defendant, willfully caused bodily injury to Victim-1 because of Victim-1's actual and perceived race, Victim-1's actual and

perceived religion, and Victim-1's actual and perceived national origin, to wit, BAZROUK kicked Victim-1 in the chest, at a protest where Victim-1 was standing with individuals wearing kippahs, carrying Israeli flags, and singing Jewish songs, causing injury to Victim-1.

b. On or about December 9, 2024, BAZROUK willfully caused bodily injury to Victim-2 because of Victim-2's actual and perceived race, Victim-2's actual and perceived religion, and Victim-2's actual and perceived national origin, to wit, BAZROUK punched Victim-2 in the face, at a protest where Victim-2 was wearing a kippah and had an Israeli flag draped around his shoulders, causing bodily injury to Victim-2.

c. On or about January 6, 2025, BAZROUK willfully caused bodily injury to Victim-3 because of Victim-3's actual and perceived race, Victim-3's actual and perceived religion, and Victim-3's actual and perceived national origin, to wit, BAZROUK punched Victim-3 in the face, at a protest where Victim-3 was wearing an Israeli flag around his shoulders and a chain with a Jewish star around his neck, causing bodily injury to Victim-3.

(Title 18, United States Code, Section 371.)

  
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JAY CLAYTON  
United States Attorney